UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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MAY ? 2 1992

REPLY TO THE ATTENTION OF

Andrew H. Perellis
Coffield, Ungaretti & Harris
3500 Three First National Plaza
Chicago, IL 60602

Re: Ecological Assessment
     American Chemical Services RI/FS

Dear Mr. Perellis:

This letter is in response to the Steering Committee's comments,
presented in your letter dated April 29, 1992, regarding the
Ecological Assessment ("EA") completed by U.S. EPA. The decision
to complete the EA is consistent with Paragraph X of the
Administrative Order by Consent. As you summarize in your letter,
Respondents submitted three drafts of the EA. U.S. EPA reviewed
and provided detailed comments on the first two drafts. The third
draft failed to incorporate several comments, including those
relating to certain key assumptions. The assumptions contained in
the EA are those recommended by BTAG as necessary for an adequate
assessment of the ecological risks present at the ACS site.
Therefore, to avoid any further delay, U.S. EPA determined that
it was necessary to step in and complete the EA by incorporating
the modifications it deemed necessary. The Administrative Order
does not entitle Respondents to EPA review and comment on their
third draft.

In your April 29, letter, you ask whether U.S. EPA would consider
further revisions to the EA. In light of Respondents' previous
failure to incorporate U.S. EPA's modifications into the EA, U.S.
EPA is not inclined to revise the EA and intends to include it,
in its present form, as part of the RI. When we receive Warzyn's
comments on the completed EA, they will of course be added to the
Administrative Record. In response to the Committee's concern
regarding the role of the EA in remedy selection, the EA will be
considered, as will the entire Administrative Record.

If you have any questions, please contact me at (312) 886-6831.

Very truly yours,

Steven C. Mason
Assistant Regional Counsel

bcc: Wayde Hartwick
     Steve Siegel
     Rodger Field